

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Docket Nos. 692, 693, 694, 695, 700, 703, 704, 705
& 706**

**CERTIFICATION OF COUNSEL WITH RESPECT TO FIRST OMNIBUS ORDER
AWARDING INTERIM ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES**

The undersigned hereby certifies the following:

1. On November 14, 2023, in accordance with *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members* [Docket No. 181], White & Case LLP, Kurtzman Carson Consultants LLC, Silverman Consulting, KPMG LLP, Winston & Strawn LLP, Baker & Hostetler LLP, Troutman Pepper Hamilton Sanders LLP and Huron Consulting Group., Inc. (each a “**Professional**” and, collectively the “**Professionals**”) filed their first interim applications (each an “**Interim Application**” and, collectively, the “**Interim Applications**”) [Docket Nos. 692-695, 700, 703-706] with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

2. Pursuant to the Interim Applications, objections to the Interim Applications, if any, were to be filed and served no later than December 4, 2023 at 4:00 p.m. (ET) (the “**Objection Deadline**”). The Professionals received no other responses to the Interim Applications and no

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

objections or responses have been filed on the docket. The hearing to consider the approval of the Interim Applications is currently scheduled for **December 11, 2023 at 2:00 p.m. (ET)**.

3. The debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases prepared a proposed form of omnibus order (the “**Proposed Order**”) approving the Interim Applications, attached hereto as **Exhibit A**. The schedule of professional compensation attached as **Exhibit 1** to the Proposed Order, accurately represents the fees and expenses (including the reflection of any reductions) of the Professionals with respect to the Interim Applications.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order attached hereto as **Exhibit A** without further notice or hearing at the Court’s earliest convenience.

Dated: December 7, 2023

Respectfully submitted,

/s/ Morgan L. Patterson

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